S.1 **Project Synopsis**

Location

The existing Las Colinas Detention Facility (LCDF) is located at the northern terminus of Cottonwood Avenue, north of Mission Gorge Road on County-owned land that lies within the boundaries of the City of Santee. The site is located on the U.S. Geological Survey (USGS) 7.5-minute El Cajon quadrangle map, Township 15 South, Range 1 West. The facility is operated on a 15.98-acre site immediately west of the 42.3-acre Edgemoor Hospital facility. The location for the proposed replacement facility includes the existing LCDF site, undeveloped property to the north and east, and a portion of the Edgemoor Hospital site to the east encompassing a total of 45 acres.

Setting

In a regional context, the project site is located in the southwestern portion of a large tract of County-owned land and is within the southern portion of the City of Santee. The site is approximately 14 miles northeast of downtown San Diego, 16 miles east of the Pacific Ocean, just north of the City of El Cajon and east of the City of Santee's municipal boundary with the City of San Diego near the Tierrasanta community. The project site is located within the San Diego River watershed, which is a long triangular-shaped area of about 440 square miles draining to the San Diego River. Habitat types in this area of San Diego County generally consist of coastal sage scrub, southern willow scrub, non-native grassland, disturbed lands and developed areas.

Land uses surrounding the project site include: residential subdivisions to the southeast (and east of Magnolia Avenue); the Edgemoor Geriatric Hospital Facility to the immediate east; single family residences to the immediate south; the currently developing office/commercial uses associated with the City's Town Center Specific Plan to the south, and west; the City's Fire Station No. 4 to the immediate south; and undeveloped land and the San Diego River to the north. The Santee Transit Center is roughly 2,500 feet to the southwest of the project site and provides a trolley line and bus service to the area.

The project site is a combination of existing LCDF buildings, disturbed lands, and scattered vegetation and is surrounded by existing and planned office/commercial uses, existing residential development, and the San Diego River. Developed land uses on the site consist of the existing LCDF and the Edgemoor Geriatric Hospital. The County, as part of a separate project, is in the process of replacing Edgemoor Geriatric Hospital with a new facility that is being constructed north of the San Diego River and south of Mast Boulevard. Once construction of the new

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150,000-square foot hospital is complete, Edgemoor patients will vacate the old buildings and the existing Edgemoor facility will be demolished. The demolition of three Edgemoor Hospital buildings would be required as part of the LCDF project and therefore impacts associated with demolition of the three buildings is addressed in this EIR. However, the EIR for the demolition of Edgemoor will analyze the impacts of demolishing all of the Edgemoor buildings, including the three buildings also analyzed in this LCDF EIR.

The project site is relatively level, with an elevation of approximately 340 feet above mean sea level (AMSL). No earthquake faults are known to traverse the project site. The nearest known active fault is the Rose Canyon Fault located approximately 13 miles to the west. As described in *Section 1.2.1.6*, the proposed project site is located within a FEMA 100-year flood zone, and within a "special flood hazards inundated by 100-year flood" of the City of Santee.

Description

The proposed project consists of the replacement of the existing LCDF with a new 1,216-bed women's detention facility. In addition to an increase in the size of the facility to accommodate the projected increase in the female inmate population, the proposed LCDF would include additional facilities and services to facilitate implementation of the San Diego County Sheriff's Department's (SDSD's) behavioral management philosophy. The new facility would also be designed to ensure the safety of staff and inmates while providing increased operational efficiency. The proposed LCDF project site consists of 45 acres of County-owned property located within the City of Santee, consisting of the existing approximately 16-acre existing LCDF site and a portion (approximately 29 acres) of the Edgemoor Geriatric Hospital (Edgemoor) site.

The project site can be easily accessed from the nearby Interstate Highway (I)-8 and State Routes (SR)-67 and SR-125, as well as major arterial roadways and public transportation services. The nearest Trolley Station (Santee Town Center) is located approximately 2,500 feet west of LCDF, and the nearest bus stop is approximately 650 feet away.

Water, electricity, sewer and other necessary utility needs will be provided by the applicable utilities, including Padre Dam Municipal Water District (PDMWD) and San Diego Gas & Electric (SDG&E).

The proposed construction is anticipated to take 36 months and would be conducted in two phases: Phase I and Phase II. Phase I of the proposed project would include infrastructure improvements (utilities) and construction of an essentially 'stand-alone' facility, including a security administration complex, medical unit, food services facilities, program building(s), a facility administration building, an energy plant sized to support the campus at buildout, and an

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estimated 832 inmate beds, depending on the demand for beds during the transition phase. Phase II would consist of two main components: (1) demolition and remediation of the existing LCDF site; and (2) construction of the Phase II components of the proposed LCDF.

S.2 <u>Summary of Significant Effects and Mitigation Measures that</u> Reduce or Avoid the Significant Effects

Table S-1 provides a summary of the impacts, mitigation, and the level of significance after mitigation for each significant effect for the proposed project addressed in *Chapter 2.0* of the EIR.

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Table S-1 Summary of Significant Effects

SIGNIFICANT AND UNAVOIDABLE IMPACTS				
Impact No.	Impact	2.1 Cultural Resources Mitigation	Conclusion and Mitigation Effectiveness	
2.1.2.1 Historical Resources				
CR-1 and CR-3	Direct and cumulative potential impacts to three historical buildings	M-CR-1 The three historic buildings impacted by the project (including the Santa Maria Building, Dietary Building and Rehabilitation Building) are significant because they represent a "broad pattern" in the state and national development of publicly-funded nursing and rehabilitation care for the dependent aged and indigent and they embody the distinctive characteristics of a type, period, and method of construction. Proposed mitigation for impacts to these buildings includes: • Preparation of a Historic American Buildings Survey (HABS) documentation in accordance with the National Park Service's Historic American Building Survey Guidelines for Preparing Written and Historical Descriptive Data; • Written documentation and photographs of the history of the site and/or buildings, including documentation of oral interviews; and • Salvage of items such as call buttons and chapel windows that can be archived and/or incorporated into a future County facility.	CR-1: Significant and Unmitigable CR-3: Significant and Unmitigable	
		<u>'</u>	Conclusion and Mitigation	
Impact No.	Impact	Mitigation	Effectiveness	
2.2.3 Cumulative Impact Ana				
TR-1	Cumulatively significant impacts to the Cuyamaca Street and Mission Gorge Road intersection	M-TR-1 For the intersection of Cuyamaca Street and Mission Gorge Road, the Traffic Improvement Master Plan recommends upgrading traffic	Significant and Unmitigable	

		signal equipment to provide better trolley and vehicle traffic flow through the Cuyamaca Street corridor as a mid-range and long-term improvement for the intersection. The Master Plan identifies an additional northbound right turn lane as long-term capacity enhancement to improve the LOS as this intersection. As part of the City of Santee's future capital improvement program (CIP), the costs of improvements to the intersection is expected to be \$382,000. This mitigation measure can be feasibly implemented, but is within the control and purview of the City of Santee. The County could mitigate its contribution to the cumulative impact by paying a fair share portion of the costs of the improvements. Based on the projected generated ADT, the County's fair share would be 2.9% or \$11,078 for ADT. The actual cost of the improvements would be	
		determined by the City of Santee. Prior to project operation, the County shall pay its fair share portion of the costs for the improvements as mitigation for the proposed project's impacts.	
		project's impacts.	
TR-2	Cumulatively significant impacts to the Prospect Avenue/Magnolia Avenue intersection	M-TR-2 For the intersection of Prospect Avenue/Magnolia Avenue, the Transportation Improvement Master Plan recommends that the existing controller should be changed to a Caltrans-compliant controller for better communications with Caltrans signal and for a smoother traffic flow at the intersection. As part of the City of Santee's CIP, the cost of improvements to the intersection is expected to be \$338,000.	Significant and Unmitigable
		This mitigation measure can be feasibly implemented, but is within the control and purview of the City of Santee. The County could mitigate its contribution to the cumulative impact by paying a fair share portion of the costs of the improvements. Based on the	

		projected generated ADT, the County's fair share would be 2.4% or \$8,112 for ADT. The actual cost of the improvements would be determined by the City of Santee. Prior to project operation, the County shall pay its fair share portion of the costs for the improvements as mitigation for the proposed project's impacts.	
TR-3	Cumulatively significant impacts to the Magnolia Avenue roadway segment between Mission Gorge Road and Riverview Parkway	For the segment of Magnolia Avenue between Mission Gorge Road and Riverview Parkway, the Transportation Improvement Master Plan does not recommend a specific improvement project as Riverview Parkway is currently a proposed roadway. However, upon review of future capital improvement projects identified by the City of Santee, a fair share contribution towards the widening of Magnolia Avenue between Mission Gorge Road and Chubb Lane would mitigate the proposed project's contribution to the cumulative impact. As part of the City of Santee's CIP, the cost of improvements to the intersection is expected to be \$3,395,300. This mitigation measure can be feasibly implemented, but is within the control and purview of the City of Santee. The County could mitigate its contribution to the cumulative impact by paying a fair share portion of the costs of the improvements. Based on the projected generated ADT, the County's fair share would be 1.37% or \$46,515.61 for ADT. The actual cost of the improvements would be determined by the City of Santee. Prior to project operation, the County shall pay its fair share portion of the costs for the improvements as mitigation for the proposed project's impacts.	Significant and Unmitigable

TR-4	Cumulatively significant impacts to the Magnolia Avenue/Mission Gorge Road intersection	For the intersection of Magnolia Avenue/Mission Gorge Road, the Transportation Improvement Master Plan states that there is no additional capacity at the intersection in any direction. The Master Plan recommends improving signal coordination by relocating westbound advanced loop detectors to the Caltrans suggested minimum setback distance of 285 feet as a minor modification. As part of the City of Santee's CIP, the cost of improvements to the intersection is expected to be \$3,309,200. This mitigation measure can be feasibly implemented, but is within the control and purview of the City of Santee. The County could mitigate its contribution to the cumulative impact by paying a fair share portion of the costs of the improvements. Based on the projected generated ADT, the County's fair share would be 0.24% or \$7,942.08 for ADT. The actual cost of the improvements would be determined by the City of Santee. Prior to project operation, the County shall pay its fair share portion of the costs for the improvements as mitigation for the proposed project's impacts.	Significant and Unmitigable
	CICAUFICANT INDACTO	MITICATED TO A LEVEL OF LECCTION CICNIFICANT	
	SIGNIFICANT IMPACTS	MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT 2.1 Cultural Resources	
Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
2.1.1.2 Archaeological Resource			
CR-2	Potential to result in impacts to unknown buried cultural resources during project grading activities	M-CR-2a All earth disturbing activities within the proposed project site shall be monitored by a qualified archaeologist during proposed grading activities. If a cultural feature, concentration of artifacts, or culturally modified soil deposits older than fifty years is discovered at any time during clearing, grading, scraping or excavation within	Less than Significant

the project area, all work shall be halted in the vicinity of the find and a qualified archaeologist shall make an evaluation of finding. A resource shall be considered significant if it meets the criteria for listing in Section 15064.5 of the State CEQA Guidelines. In addition, a Native American monitor shall be present during all phases of grading involving Pleistocene soils to ensure no inadvertent impact to buried prehistoric resources. The tribal affiliation of the monitor shall be as determined in consultation with the appropriate local tribes.

M-CR-2b

If the resource found is determined to be significant, then a data recovery program shall be performed. A data recovery program as described in a site-specific research design document shall be developed and implemented by a qualified archaeologist and approved by the County for any significant archaeological resource. These investigations shall be directed at recovering significant information that would be lost as a result of impacts to the site. The document shall discuss the cultural context, consider research issues to be addressed, identify specific field and analytical methods to be implemented, and provide for curation of collected materials in accordance with Secretary of Interior Standards (36 CFR Part 79). All ground disturbance associated with the data recovery shall be monitored by a Native American to assist the County in evaluating the significance of material encountered. Results of the data recovery shall be documented in a technical report submitted to and accepted by the County.

M-CR-3

Refer to M-CR-1.

	2.3 Biological Resources				
	Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness	
2.3.2.1	Special Status Species				
B-1		Direct impacts to nesting birds/raptors	M-BI-1 To avoid any direct impacts to white-tailed kite, Cooper's hawk, California horned lark, raptor species, or other nesting birds, removal of habitat that may support active nests shall occur outside of the combined breeding season of January 15 to September 15. If removal of habitat must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the construction area. The pre-construction survey must be conducted within 10 calendar days of the start of construction and the results submitted to the County for review and approval prior to initiating any construction activities. Nests that are detected within the proposed impact areas shall be flagged and avoided until nesting is completed. The nest shall be monitored to ensure that no nest is removed or disturbed until all young have fledged or the nest is no longer active. Construction activities shall be avoided for a distance of 300 feet around active nests identified within the project impact area.	Less than Significant	
B-2		Indirect noise impacts to offsite nesting birds	M-BI-2a To avoid indirect impacts from demolition and construction noise to breeding or nesting least Bell's vireo, white-tailed kite, yellow-breasted chat, Cooper's hawk, yellow warbler, and raptors within the noise contour greater than 60 dB(A) Leq, which is a distance of up to 500 feet from the project site, grading and other mechanized construction activities that produce noise in excess of 60 dB(A) Leq shall be conducted outside of the combined breeding season of January 15 to September 15 for these species. If construction activities must occur during the breeding season, a qualified	Less than Significant	

		biologist shall conduct a pre-construction survey to determine the presence or absence of nesting raptors and special status bird species listed above within areas exposed to noise levels greater than 60 dB(A) Leq. The pre-construction survey must be conducted within 10 calendar days of the start of construction and the results submitted to the County for review and approval prior to initiating any construction activities. M-BI-2b If nesting birds are detected during the pre-construction/pre-demolition survey, noise attenuating measures, such as noise walls or berms shall be used to reduce the level of noise within the habitat to less than 60 dB(A) Leq. A qualified acoustician shall monitor noise weekly during site clearing and monthly during active construction or as applicable based on construction schedule when excessive noise may be produced in order to document that the noise levels are kept below 60 dB(A) Leq.	
2.3.2.2 Riparian or Sensitive Na	tural Communities		
B-3	Permanent removal of 0.6 acre of disturbed coastal sage scrub and 4.3 acres of non-native grassland	M-BI-3a Prior to project implementation, preserve 1.2 acres (2:1 ratio) of Diegan coastal sage scrub and 2.2 acres (0.5:1 ratio) of non-native grassland off-site (<i>Table 2.3-1</i>), in accordance with mitigation ratios generally accepted by the County for impacts to these types of habitat. Mitigation is proposed to consist of purchase of credits at the Rancho San Diego Mitigation Bank. M-BI-3b Impacts to coastal sage scrub habitat may be allowed by obtaining a Habitat Loss Permit in accordance with Section 4(d) of the Endangered Species Act. The Section 4(d) Special Rule allows a loss of five percent of coastal sage scrub habitat in any individual	Less than Significant

			subregion during the preparation of a regional NCCP. The wildlife agencies must concur with the Section 4(d) findings prior to allowing the impacts to coastal sage scrub habitat.	
2.3.2.4	Federal Wetlands			
B-4		Loss of 0.04 acre of ACOE/CDFG/ RWQCB- jurisdictional ephemeral waters	Prior to impacts to 0.037 acre (0.04 acre when rounded) of ephemeral drainage under the jurisdiction of ACOE, CDFG and RWQCB, the County shall obtain the following permits prior to impacts to this resource: ACOE 404 permit, RWQCB 401 Water Quality Certification, and a CDFG Code 1600 Streambed Alteration Agreement. Impacts shall be mitigated at a 1:1 ratio by creation or purchase of credits for the creation of jurisdictional habitat of similar functions and values. A suitable mitigation site shall be selected and approved by the resource agencies during the permitting process. The site shall be located within the vicinity of the drainage impact or within the watershed of the San Diego River. A conceptual wetland mitigation plan shall be prepared by the County and approved by the resource agencies as required by the applicable permits.	Less than Significant
2.3.2.5	Local Policies, Ordinano			
B-5		Removal of one coast live oak tree on the existing LCDF site	M-BI-5 Impacts to one coast live oak tree will be mitigated by planting two replacement coast live oak trees. The replacement trees shall be at least 5-gallon size since trees that are of this size have been shown to be healthier and to grow more quickly than trees that are in larger containers. The trees shall be planted within the landscaped areas of the proposed project where it is suitable to include a relatively large tree and shall be monitored for a period of 5 years. If the trees die during the monitoring period, the trees shall be replaced.	Less than Significant

Impact No. Impact Mitigation Conclusion and Mitigation Effectiveness	2.4 Geology and Soils					
Indirect geology and soils impacts related to liquefaction effects Prior to grading, the County shall ensure that the proposed project's grading plans demonstrate compliance with remediation recommendations in the June 28, 2004 Geotechnical Investigation for the Town Center Specific Plan prepared by Geocon (2004), including but not limited to: a) Previously placed fill and alluvium within areas of planned new grading or improvements shall be removed and recompacted. b) To provide uniform bearing conditions for support of planned buildings and improvements, the upper 5 feet of Younger and Older Alluvium shall be removed and recompacted. c) Finish-grade elevations for building pads shall be designed so that at least 10 feet of properly compacted fill exists above the groundwater to provide a sufficient thickness of non-liquefiable soil. d) Prior to placing new fill, the base of overexcavations shall be scarified to a depth of at least 12 inches, heavily moisture conditioned, and compacted. This should result in densification of the upper 2 to 3 feet of existing soil at the base of the excavation. Fill soils may then be placed and compacted in layers to the design finish-grade elevations. The layers shall be no thicker than will allow for adequate bonding and compaction. All fill (including scarified ground surfaces and wall and utility trench backfill) shall be compacted to at	INDIATION I TOTAL I WITHOUT I					
Prior to grading, the County shall ensure that the proposed project's grading plans demonstrate compliance with remediation recommendations in the June 28, 2004 Geotechnical Investigation for the Town Center Specific Plan prepared by Geocon (2004), including but not limited to: a) Previously placed fill and alluvium within areas of planned new grading or improvements shall be removed and recompacted. b) To provide uniform bearing conditions for support of planned buildings and improvements, the upper 5 feet of Younger and Older Alluvium shall be removed and recompacted. c) Finish-grade elevations for building pads shall be designed so that at least 10 ered for properly compacted fill exists above the groundwater to provide a sufficient thickness of non-liquefiable soil. d) Prior to placing new fill, the base of overexcavations shall be scarified to a depth of at least 12 inches, heavily moisture conditioned, and compacted. This should result in densification of the upper 2 to 3 feet of existing soil at the base of the excavation. Fill soils may then be placed and compacted in layers to the design finish-grade elevations. The layers shall be no thicker than will allow for adequate bonding and compaction. All fill (including scarified ground surfaces and wall and utility trench backfill) shall be compacted to at	2.4.2.3 Seismic Induced Groun	d Failures Including Liquefaction				
least 90 percent of maximum dry density at near-optimum moisture content or slightly above as determined by ASTM D1557-02. 2.4.2.5 Soil Erosion/Unstable Soils		related to liquefaction effects	Prior to grading, the County shall ensure that the proposed project's grading plans demonstrate compliance with remediation recommendations in the June 28, 2004 Geotechnical Investigation for the Town Center Specific Plan prepared by Geocon (2004), including but not limited to: a) Previously placed fill and alluvium within areas of planned new grading or improvements shall be removed and recompacted. b) To provide uniform bearing conditions for support of planned buildings and improvements, the upper 5 feet of Younger and Older Alluvium shall be removed and recompacted. c) Finish-grade elevations for building pads shall be designed so that at least 10 feet of properly compacted fill exists above the groundwater to provide a sufficient thickness of non-liquefiable soil. d) Prior to placing new fill, the base of overexcavations shall be scarified to a depth of at least 12 inches, heavily moisture conditioned, and compacted. This should result in densification of the upper 2 to 3 feet of existing soil at the base of the excavation. Fill soils may then be placed and compacted in layers to the design finish-grade elevations. The layers shall be no thicker than will allow for adequate bonding and compaction. All fill (including scarified ground surfaces and wall and utility trench backfill) shall be compacted to at least 90 percent of maximum dry density at near-optimum moisture content or slightly above as determined by ASTM	Less than Significant		

GE-2		Unstable and expansive soils could result in damage to facilities	M-GE-2 Implementation of M-GE-1 described above would reduce impacts due to unstable soils to below a level of significance.	Less than Significant
		2.5	Hazards and Hazardous Materials	
	Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
2.5.2.1	Hazardous Materials			
HZ-1		Accidental spills of hazardous materials during construction activities could potentially cause soil or groundwater contamination	Prior to construction (including demolition), all contractor and subcontractor project personnel shall receive training regarding the appropriate work practices necessary to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures. M-HZ-1b The construction contractor shall ensure that no hazardous materials shall be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment shall be provided for all trash. All potentially hazardous material construction waste shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials. M-HZ-1c A hazardous substance management, handling, storage, disposal, and emergency response plan shall be prepared and implemented by the construction contractor. The plan shall include measures that comply with all applicable laws and regulations to ensure that risks of release of materials through use, transport and disposal of the materials are reduced to the maximum extent practicable. The	Less than Significant

		final plan shall be approved by the County Department of General Services. M-HZ-1d The construction contractor shall ensure that hazardous materials spill kits are maintained onsite for small spills.	
HZ-2	During demolition and construction, contaminants could be mobilized if contaminated soil is exposed to runoff that could transport hazardous substances outside the work area, which could cause a threat to the public and waters in the vicinity of the project	If demolition of existing facilities, grading, construction, or operation of proposed facilities encounter hazardous waste and/or hazardous materials, the County shall ensure compliance with the State of California CCR Title 23 and Title 26 and health and safety regulations as enforced by the San Diego County DEH. Excavated soils appearing to be impacted by hazardous waste or materials shall be characterized, managed and disposed of in accordance with the San Diego County DEH Site Assessment and Mitigation (SAM) manual. This determination can be made by a visual (i.e., stained soil) and/or odor assessment. The San Diego County DEH and RWQCB shall be contacted regarding provisions for possible reuse as backfill of soils impacted by hydrocarbons. M-HZ-2b Due to the potential for residual pesticides to be in the soil on the project site, soil samples shall be collected on the proposed project site prior to construction. Samples shall be analyzed by a certified laboratory for organochlorine pesticides. The sampling program shall be conducted in accordance with the San Diego County SAM manual. If pesticides above permissible exposure limits for residential uses are detected from the site, a program shall be implemented to properly remediate affected soils in accordance with the County DEH's SAM manual standards.	Less than Significant

		M-HZ-2c Any septic systems and above ground storage tanks located onsite shall be removed and/or closed under permit and approval of County DEH prior to grading.	
HZ-3	The existing LCDF structures may contain hazardous materials such as asbestos and lead paint, and these substances could be released during demolition, also resulting in a significant indirect impact	Prior to the start of demolition and/or construction, an asbestos survey shall be performed by the Department of Environmental Health (DEH), Occupational Health Program (OHP) for all onsite structures that will be disturbed by demolition activities in accordance with County of San Diego Administrative Manual Asbestos Policy 0050-01-9. The survey shall thoroughly inspect the building to be demolished, document the location and types of asbestos found, and shall determine whether any on-site abatement of asbestos containing materials is necessary. If asbestos is located during the survey an abatement work plan shall be prepared by County DEH in compliance with local, state, and federal regulations for any necessary removal of such materials. The work plan shall include specifications for the proper removal and disposal of asbestos. County DEH, OHP, or designee will provide project surveillance of the asbestos work activities to ensure that proper controls are implemented and to ensure compliance with the work plan requirements and abatement contractor specifications. Any necessary asbestos sampling and abatement shall be done by a Cal/OSHA certified asbestos consultant/contractor. In addition, the Air Pollution Control District (APCD) and the California Occupational Safety and Health Administration (Cal/OSHA) have notification requirements pertaining to the disturbance of asbestos containing materials (ACMs). When applicable, these notifications must be made prior to the activity as follows:	Less than Significant

		 a. 10-day notification to APCD for renovation/demolition activities (Note: These are 10 working days; asbestos activities can start on the 11th day. Working days means Monday through Friday and includes holidays that fall on any of the days Monday through Friday). b. 24-hour notification to Cal/OSHA. M-HZ-3b Prior to the start of demolition, a lead based paint survey shall be performed by a Certified Lead Inspector/Assessor as defined in Title 17, CCR Section 35005 for all onsite structures that will be disturbed by demolition activities in accordance with local, state and federal regulations. The survey shall thoroughly inspect the building to be demolished, document the location and types of lead based paint found, and shall determine whether any on-site abatement of lead based paint is necessary. If lead based paint is located during the survey an abatement work plan shall be prepared by County DEH in compliance with local, state, and federal regulations for any necessary removal of such materials. The work plan shall include specifications for the proper removal and disposal of lead based paint. County DEH, OHP, or designee will provide project surveillance of the lead based paint work activities to ensure that proper controls are implemented and to ensure compliance with the work plan requirements and abatement contractor specifications. 	
HZ-4 & 5	If the BEP document was not updated to account for the additional hazardous materials that could be used, a significant indirect impact could result. Also, the project's potential to emit and/or handle hazardous materials within one-quarter mile	M-HZ-4 & 5 Prior to opening Las Colinas, SDSD shall update its BEP to reflect transport, storage, use, and disposal of hazardous materials following construction of the proposed project. These updates shall include the use of chemicals currently used at the LCDF, as well as any new chemicals required to operate the new facility. The updated BEP shall be submitted to the San Diego County DEH. All	Less than Significant

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	of schools would be potentially significant.	1 3			
	2.6	Hydrology and Water Quality			
Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness		
2.6.2.1 Water Quality Standards					
HY-1	Without proper management of sediment and pollutants, the project could violate water quality standards	M-HY-1 The County shall implement Low Impact Development Integrated Management Practices (LID IMPs) to reduce stormwater runoff rates and duration. The LID IMPs shall provide at least a 19.1 percent reduction in stormwater runoff rates to achieve no net increase in flow quantities and rates discharged from the project site. This shall be accomplished by strategic placement of LID IMPs uniformly throughout the project site to mimic the natural flow regime and capture any net increase in runoff through increased infiltration. The following specific LID IMPs shall be considered in the project's final design to meet the 19.1 percent reduction in stormwater runoff: Vegetated roof systems Infiltration trench/islands/beds Vegetated or rock swales/filter strips Rain water harvesting (cisterns/rain barrels) Bioretention Permeable pavement and materials	Less than Significant		

2.6.2.3 Existing or Planned Drainage System							
HY-2	The project would result in an increase in impervious surfaces compared to what was projected in the conceptual design, resulting in the potential for direct impacts to the existing drainage system	M-HY-2 The City of Santee has established drainage fees, which are typically collected upon issuance of a building permit for projects within City limits. While the County is not required to obtain a building permit from the City, the County shall pay a fee based on City's development impact fee worksheet. The County shall pay the fee before the start of construction.	Less than Significant				

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S.3 Areas of Controversy

Respondents to the NOP public scoping period expressed concern about several environmental issues. Key issues include location of the proposed project with respect to adjacent land uses, compatibility with surrounding land uses, public safety, and project alternatives. These concerns have been identified as areas of known controversy and are analyzed in the corresponding issue areas in this EIR. *Appendix A* contains the comment letters received in response to the NOP.

S.4 <u>Issues to be Resolved by the Decision-Making Body</u>

The County Board of Supervisors (Board) would be required to make decisions concerning the significant impacts that would result with implementation of the proposed project. First, the Board must determine if the benefits of the proposed project outweigh the potential significant unavoidable impacts related to Cultural Resources and Transportation/Traffic. The Board would be required to adopt a Statement of Overriding Considerations explaining why they would be willing to accept each significant impact. This decision must balance the benefits of the proposed project against the unavoidable environmental effects in determining whether to approve the project.

Concerning significant impacts that can be avoided and reduced with mitigation measures, the Board would be required to adopt findings for each significant impact that show the project has been changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact. The Board must determine that adopted mitigation measures are feasible and fully enforceable through permit conditions, agreements or other measures.

S.5 **Project Alternatives**

A brief summary of each project alternative is provided in *Table S-2*. A summary of significant impacts resulting from the proposed project compared to impacts resulting from the project alternatives is provided in *Table S-3*.

Table S-2
Descriptions of Project Alternatives

Alternative	Description						
Mid-rise Alternative	This alternative assumes that the existing LCDF would be demolished and a new facility would be						
(see Section 4.2.1)	built on 16 acres of County-owned land. Development of a replacement women's detention facility						
	using a multi-story mid-rise facility is designed to use less ground space than proposed for the						
	project. The 16-acre site would be immediately east of and adjacent to the existing LCDF.						
	Development would require a four-story facility and approximately 120,000 to 150,000 square feet						
	on approximately eight of the acres, with the remaining eight acres used for recreation, parking, and						

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Alternative	Description
	buffer. This alternative would accommodate 1,216 female inmates, the same as proposed by the project. The same staff levels would be required as under the Proposed Project. With implementation of the Mid-rise Alternative, at least one of the three historical buildings, the Santa Maria Building, would still be impacted. Therefore, while impacts would be reduced when compared to the Proposed Project by avoiding impacts to the Dietary Building and the Rehabilitation Building, significant unmitigable impacts to historical resources would still result. Regarding biological resources, this alternative would result in similar impacts to nesting birds/raptors, avoid the Proposed Project's impacts to coastal sage scrub and one coast live oak tree, and reduce impacts to unvegetated waters and non-native grassland. For traffic, the EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated, since feasible, available mitigation measures have been recommended in this EIR to reduce significant impacts to below a level of significance, but are outside the County's control to implement. The Mid-rise Alternative would not avoid the significant impacts of the Proposed Project, since the same number of beds and same staffing levels would be required; therefore, traffic impacts would be similar. This alternative would result in greater visual impacts due to the height of four-story structures.
	This alternative would meet three of the project objectives, but would not meet the County's project objective 4, because with development of a mid-rise facility, implementation of the SDSD's inmate management philosophy would not be realized, as it requires that the physical layout of the facility would allow for clear lines-of-sight. Without clear lines-of-sight, some independent inmate movement would not be permitted and SDSD's "choice and change" management approach would not be implemented. As this alternative does not meet all of the project objectives, the proposed project is preferred.
20-Acre Alternative (see Section 4.2.2)	This alternative assumes that the existing LCDF would be demolished and a new facility would be built on 20 acres of County-owned land immediately east of the existing LCDF. This alternative would implement Phase I of the proposed project, but would not construct additional facilities beyond Phase I. The alternative would accommodate 800 female inmates, which is less than the proposed by the project. All structures would be one or two stories, and would result in more two story buildings when compared to the Proposed Project in order to accommodate all the same programs and facilities on a smaller campus. With implementation of the Mid-rise Alternative, at least one of the three historical buildings, the Santa Maria Building, would still be impacted. Therefore, while impacts would be reduced when compared to the Proposed Project by avoiding impacts to the Dietary Building and the Rehabilitation Building, significant unmitigable impacts to historical resources would still result. Regarding biological resources, this alternative would result in similar impacts to nesting birds/raptors, avoid the Proposed Project's impacts to coastal sage scrub and one coast live oak tree, and reduce impacts to vegetated waters and non-native grassland. For traffic, the EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated, since feasible, available mitigation measures have been recommended in this EIR to reduce significant impacts to below a level of significance, but are outside the County's control to implement. The 20-acre Alternative would reduce some of the significant impacts of the Proposed Project, since the same number of beds would be reduced from 1,216 to 800. However, since most of Proposed Project's traffic impacts are cumulative, traffic impacts resulting from this alternative would be reduced but still significant and unmitigated. This alternative would meet three of the County's project objectives, but would not meet project objective 2, meet
	be significant and not mitigated, since feasible, available mitigation measures has recommended in this EIR to reduce significant impacts to below a level of significance outside the County's control to implement. The 20-acre Alternative would reduce so significant impacts of the Proposed Project, since the same number of beds would be red 1,216 to 800. However, since most of Proposed Project's traffic impacts are cumulat impacts resulting from this alternative would be reduced but still significant and unmitigated. This alternative would meet three of the County's project objectives, but would not me objective 2, meet the projected needs of the County for women offenders to the year 202

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Alternative	Description
Otay Mesa Alternative (see Section 4.2.3)	With implementation of the Otay Mesa Alternative, the existing LCDF in Santee would be closed and demolished and a new women's detention facility would be developed on the Otay Mesa Alternative site area. This alternative would accommodate 1,216 women inmates, the same as the proposed project. It is anticipated that significant impacts to cultural resources could be mitigated for the alternative site, and therefore impacts to cultural resources would be reduced with the Otay Mesa Alternative when compared to the Proposed Project, as a result of avoidance of significant historical resources. The Otay Mesa Alternative would require the development of an undeveloped 45-acre site, potentially impacting sensitive natural communities (wetlands, foraging habitat, and sensitive onsite vegetation communities). These biological impacts are greater than those of the proposed project. Implementation of the Otay Mesa Alternative would avoid traffic impacts, while the proposed project would result in a significant and unmitigable traffic impact.
	The Otay Mesa Alternative would be able to meet project objectives 1 and 2. However, this alternative would not meet the County's objective 3. Critical to SDSD, the Otay Mesa site would result in an extreme operational inefficiency related to the booking process. In addition to providing detention areas for convicted inmates, the existing LCDF also provides onsite booking facilities. As with the existing LCDF, the proposed LCDF project would include an onsite booking facility, which would continue to provide an operational benefit to SDSD staff, and other police officers and regional agencies in the central part of San Diego County, including the 51 regional agencies that currently use the existing LCDF to book arrestees. With this alternative, since the booking facility would be located in Otay Mesa, officers transporting females arrested throughout the County would be required to drive to and from the Otay Mesa Alternative site for booking, court appearances, etc. When compared to the relatively central location of the Proposed Project in Santee, an onsite booking facility at Otay Mesa would generally increase the amount of time an officer would be required to leave his/her beat, since an officer making an arrest in Lemon Grove, Santee, El Cajon, or other neighboring areas would spend additional time transferring arrestees to the Otay Mesa site. The public safety needs of the County are best served when police officers and deputies spend more time patrolling the community and responding to calls for service and less time in transit to book persons taken into custody.
	Also, medical and mental health providers are not in proximity to the Otay Mesa site. Inmates not treated onsite at the nearby RJ Donovan State Correctional Facility, for example, are taken to UCSD Medical Center in Hillcrest, approximately 27 miles away, or 36 minutes driving time one way.
	The Otay Mesa Alternative would also not meet project objective 4, since it would not permit the implementation of the SDSD's inmate management philosophy and visitation program, because it does not provide convenient access to public transportation services. Public bus transportation is available in Otay Mesa from the MTS bus stop, which is located approximately 1.1 miles to the southwest of the alternative site. No other public transportation is available within the vicinity of the site. Visits with dependent children are especially important to SDSD's inmate management philosophy in that they support the rehabilitation of women and reinforce the principles taught in parenting and life skills courses.
	As this alternative does not meet all of the project objectives, the proposed project is preferred.
Camp Elliott Alternative (see Section 4.2.4)	With implementation of the Camp Elliott Alternative, the existing LCDF in Santee would be closed and demolished and a new multi-custody women's detention facility capable of accommodating 1,216 women inmates would be built on the Camp Elliott site, which is an undeveloped piece of land between Scripps Ranch and Highway 52. It is anticipated that significant impacts to cultural resources could be mitigated for the alternative site, and therefore impacts to cultural resources would be reduced with the Camp Elliott Alternative when compared to the Proposed Project, as a

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Alternative	Description
	result of avoidance of significant historical resources. The area around the site is dominated by sensitive biological resources and constitutes one of the largest and biologically most important remaining open space areas in San Diego. Biological impacts resulting from this alternative would be greater than those of the proposed project due to known sensitive resources onsite and impacts resulting from access road construction. Geological impacts are also considered to be greater when compared to the proposed project due the requirement for additional grading because of the site's hilly terrain and the potential for landslides. Due to the potential presence of hazardous materials and nearby MCAS operations, impacts resulting from hazards and hazardous materials are considered to be greater than those anticipated under the proposed project. Implementation of the Camp Elliott Alternative is not anticipated to generate significant impacts to traffic. Implementation of this alternative would require development of access and would result in additional impacts to biological resources, cultural resources, air quality, noise and hydrology. Therefore, while the alternative would avoid significant impacts of the Proposed Project (traffic), it would result in additional impacts in other issue areas. It should be noted, however, that if the City of Santee implements the Proposed Project's traffic mitigation measures, the Proposed Project's traffic impacts would be fully mitigated to below a level of significance, and the Camp Elliott Alternative would not offer a substantial advantage in terms of impact avoidance.
	it would not provide convenient public transportation. Because the alternative results in greater impacts to biological resources, geology and soils, and hazardous materials when compared to the proposed project, the proposed project is preferred.
Campo Alternative (see Section 4.2.5)	Under this alternative, the existing LCDF in Santee would be closed and demolished and a new multi-custody women's detention facility capable of accommodating 1,216 women inmates would be built within the County's JRF property in the community of Campo in eastern San Diego County. For cultural resources, it is anticipated that any impacts to cultural resources at the Campo Alternative site would be mitigable, and therefore, impacts for this alternative would be reduced when compared to the Proposed Project due to avoidance of significant impacts on historical resources. Biological impacts resulting from this alternative would be greater than those of the proposed project due to known sensitive resources onsite and impacts resulting from developing an undeveloped site. Because the site is marked by hilly terrain, more grading would be required at this site than at the proposed project site, and geological impacts are anticipated to be greater.
	This alternative would be able to meet project objectives 1 and 2. However, this alternative would not meet the County's objective 3. Critical to SDSD, the Campo site would result in an extreme operational inefficiency related to the booking process. The existing LCDF, in addition to detention areas for convicted inmates, provides onsite booking facilities. As with the existing LCDF, the proposed LCDF project would include an onsite booking facility, which would continue to provide an operational benefit to SDSD staff, and other police officers and regional agencies in the central part of San Diego County, including 51 regional agencies that currently use the existing LCDF to book arrestees. With this alternative, since the booking facility would be located in Campo, officers transporting females arrested throughout the County would be required to drive to and from the Campo Alternative site for booking, court appearances, etc. When compared to the relatively central location of the Proposed Project in Santee, an onsite booking facility at Campo would generally increase the amount of time an officer would be required to leave his/her beat, since an
	officer making an arrest in Lemon Grove, Santee, El Cajon, or other neighboring areas would spend additional time transferring arrestees to the Campo site. The public safety needs of the County are best served when police officers and deputies spend more time patrolling the community and responding to calls for service and less time in transit to book persons taken into custody.

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Alternative	Description				
	Also, medical providers are not in proximity to the Campo site. The closest facilities are Paradise Valley Hospital in National City, which is approximately 46 miles away, and Sharp Grossmont Hospital in La Mesa, which is approximately 49 miles away.				
The Campo Alternative would not also meet project and project objective 4, since permit the implementation of the SDSD's inmate management philosophy and visitat which has the objective of reducing repeat offending and recidivism. This is because Alternative does not provide convenient access to public transportation services. transportation is available in Campo from MTS (route 888), but would not provide access from the project's service area. Visits with dependent children are especially SDSD's inmate management philosophy in that they support the rehabilitation of reinforce the principles taught in parenting and life skills courses.					
	As this alternative does not meet all of the project objectives and results in greater biological and geologic impacts, the proposed project is preferred.				
No Project Alternative (see Section 4.2.6)	With implementation of the No Project Alternative, the existing LCDF would stay in its same location and the surrounding land would be built out consistent with the City of Santee Town Center Specific Plan Amendment, which calls for business park commercial/office uses. The old structures and deficiencies at the LCDF would not be replaced with modern facilities or expanded to meet the County's projected needs for multi-custody women offenders, thereby threatening SDSD's ability to meet the urgent need to provide modern facilities that will reduce overcrowding and deficient conditions at the existing LCDF. The proposed project's identified significant impacts would generally be the same under the No Project Alternative. Impacts to traffic would be greater due to increased vehicle trips associated with commercial development that would occur without the construction of the new LCDF.				
	This alternative does not meet any of the project objectives, and as a result the proposed project is preferred.				

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Comparison of Proposed Project and Alternatives' Impacts

Issue Area	Proposed Project	Mid-rise Alternative	20-acre Alternative	Otay Mesa	Camp Elliott	Campo	No Project*
Significant Environmental Effects of the Proposed Project							
Cultural Resources	Significant and unmitigable.	Similar when compared to the Proposed Project since it would still result in significant unmitigable impacts to at least one historical building.	Similar when compared to the Proposed Project since it would still result in significant unmitigable impacts to at least one historical building.	Less than the Proposed Project since this alternative would not likely result in unmitigable impacts.	Less than the Proposed Project the Proposed Project since this alternative would not likely result in unmitigable impacts.	Less than the Proposed Project the Proposed Project since this alternative would not likely result in unmitigable impacts.	The <u>same</u> or <u>similar</u> as the Proposed Project.
Biological Resources	Less than significant with mitigation incorporated.	Less than the Proposed Project.	Less than the Proposed Project.	Greater than the Proposed Project due to the requirement to develop an undeveloped 45-acre site, and potential presence of wetlands, foraging habitat, and sensitive onsite vegetation communities.	Greater than the Proposed Project due to known sensitive resources onsite and impacts resulting from access road construction.	Greater than the Proposed Project due to undeveloped nature and resources present.	The <u>same</u> as the Proposed Project.
Geology/Soils	Less than significant with mitigation incorporated.	The <u>same</u> or <u>similar</u> as the Proposed Project.	The <u>same</u> or <u>similar</u> as the Proposed Project.	The <u>same</u> or <u>similar</u> as the Proposed Project.	Greater than the Proposed Project due to hilly terrain and potential for landslides.	Greater than the Proposed Project due to hilly terrain.	The <u>same</u> or <u>similar</u> as the Proposed Project.
Hazards and Hazardous Materials	Less than significant with mitigation incorporated.	The <u>same</u> or <u>similar</u> as the Proposed Project.	The <u>same</u> or <u>similar</u> as the Proposed Project.	Less than the Proposed Project due to lack of nearby sensitive receptors.	Greater than the Proposed Project due to ordnance hazard potential and nearby MCAS operations.	The <u>same</u> or <u>similar</u> as the Proposed Project.	The <u>same</u> or <u>similar</u> as the Proposed Project.

Table S-3 (Continued)

Comparison of Proposed Project and Alternatives' Impacts

Issue Area	Proposed Project	Mid-rise Alternative	20-acre Alternative	Otay Mesa	Camp Elliott	Campo	No Project*
Hydrology and Water Quality	Less than significant with mitigation incorporated.	The <u>same</u> or <u>similar</u> as the Proposed Project.	The <u>same</u> or <u>similar</u> as the Proposed Project.	Less than the Proposed Project as the site is not within a 100-year floodplain.	Less than the Proposed Project as site is not within 100-year floodplain.	Less than the Proposed Project as the site is not within a 100-year floodplain.	The <u>same</u> or <u>similar</u> as the Proposed Project.
Transportation/Traffic	Significant; recommended mitigation measures would reduce impacts to less than significant but are outside of the County's control; therefore impacts are assumed to be unmitigated.	The <u>same</u> or <u>similar</u> as the Proposed Project.	The <u>same</u> or <u>similar</u> as the Proposed Project.	Less than the Proposed Project.	Less than the Proposed Project.	Less than the Proposed Project.	Greater than the Proposed Project due to increased vehicle trips associated with commercial development.

^{*} Describes impacts under the assumption that if the Proposed Project is not approved, the LCDF would stay in its current location, and the surrounding land would be built out consistent with the City of Santee Town Center Specific Plan Amendment.